

JASON M. WUCETICH (STATE BAR NO. 222113)  
jason@wukolaw.com  
DIMITRIOS V. KOROVILAS (STATE BAR NO. 247230)  
dimitri@wukolaw.com  
WUCETICH & KOROVILAS LLP  
222 N. Pacific Coast Hwy., Suite 2000  
El Segundo, CA 90245  
Telephone: (310) 335-2001  
Facsimile: (310) 364-5201

MICHAEL S. MORRISON (SBN 205320)  
mmorrison@amfllp.com  
ERIN A. LIM (SBN 323930)  
elim@amfllp.com  
ALEXANDER MORRISON + FEHR LLP  
1900 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Telephone: (310) 394-0888  
Facsimile: (310) 394-0811

Attorneys for Plaintiffs  
WILLIAM MULLER and ANTONIO KNEZEVICH,  
individually and on behalf of all others similarly situated

*[Additional Counsel Listed on Following Pages]*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

WILLIAM MULLER and ANTONIO  
KNEZEVICH, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

UKG INC.; and DOES 1 through 10,

Defendants.

ADAM BENTE, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

UKG INC.

Defendant.

Case No.: 22-CV-00346-SI

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONSOLIDATE RELATED  
ACTIONS**

Case No.: No. 3:22-cv-02554-SI

1 CINDY VILLANUEVA, individually and on  
2 behalf of all others similarly situated,

3 Plaintiff,

4 v.

5 UKG Inc.,

6 Defendant.  
7

Case No.: 3:22-cv-01789-SI

1 RONALD A. MARRON (SBN175650)  
ron@consumeradvocates.com  
2 ALEXIS M. WOOD (SBN270200)  
alexis@consumeradvocates.com  
3 KAS L. GALLUCCI (SBN288709)  
kas@consumeradvocates.com  
4 LAW OFFICES OF RONALD A. MARRON  
5 651 Arroyo Drive  
San Diego, CA 92103  
6 Tel: (619) 696-9006  
7 Fax: (619) 564-6665

8 *Counsel for Plaintiff Adam Bente*

9 JONATHAN M. LEBE (SBN284605)  
jon@lebelaw.com  
10 ZACHARY T. GERSHMAN (SBN328004)  
zachary@lebelaw.com  
11 NICOLAS W. TOMAS (SBN339752)  
nicolas@lebelaw.com  
12 LEBE LAW  
777 S. Alameda Street, Second Floor  
13 Los Angeles, CA 90021  
Tel: (213)444-1973  
14

15 *Counsel for Plaintiff Cindy J. Villanueva*

16  
17 Plaintiffs Williams Muller, (“Muller”), Antonia Knezevich (“Knezevich”), Adam Bente  
18 (“Bente”) and Cindy Villanueva (“Villanueva”), by and through their counsel, and Defendant  
19 UKG Inc. (“UKG” or “Defendant”), by and through its counsel, hereby stipulate to the  
20 following:

21 WHEREAS, there are now currently pending before this Court, the Hon. Susan Illston  
22 presiding, the following three actions:

- 23 1. *Muller v. UKG Inc.*, Case No. 22-00346, filed January 18, 2022, and originally  
24 assigned to this Court (the “*Muller* Action”);
- 25 2. *Bente v. UKG Inc.*, Case No. 22-02554, filed March 4, 2022 in the Southern District  
26 of California, transferred to this District on April 26, 2022, and thereafter related to  
27 the *Muller* Action on May 4, 2022 (the “*Bente* Action”);  
28

1           3. *Villanueva v. UKG Inc.*, Case No. 22-01789, filed March 21, 2022 in this District  
 2           and thereafter related to the *Muller* action on April 18, 2022 (the “*Villanueva*  
 3           Action”);

4           WHEREAS, the *Muller*, *Bente*, and *Villanueva* Actions (the “Related Actions”) are each  
 5           putative class actions against UKG that assert claims on behalf of a purported nationwide class  
 6           and California subclass of individuals whose personally identifiable information (“PII”) and  
 7           payroll systems were allegedly compromised as a result of a ransomware attack on a subset of,  
 8           UKG’s workforce management software applications that are hosted on the Kronos Private  
 9           Cloud in December 2021 (the “Data Breach”);

10          WHEREAS, the Related Actions concern substantially similar parties, arise from the  
 11          same set of facts, and assert similar causes of action, including negligence, unjust enrichment,  
 12          declaratory judgment, breach of contract, right to privacy, the California Consumer Records Act,  
 13          California Consumer Privacy Act, and the California Unfair Competition Law;

14          WHEREAS, the parties in each of the Related Actions have met and conferred and  
 15          agreed to work cooperatively, to coordinate their efforts, and to promote judicial economy and  
 16          avoid duplicative discovery and motion practice;

17          WHEREAS, the parties therefore have agreed to consolidate the Related Actions for all  
 18          purposes pursuant to Fed. R. Civ. P. 42(a);

19          WHEREAS, in order to advance the case through an orderly process, the parties have  
 20          agreed to a schedule that extends Defendant’s time to respond to the complaints until after a  
 21          consolidated amended complaint is filed. The parties have also agreed to a schedule governing  
 22          briefing on any motion to dismiss or responses to the consolidated amended complaint.

23          WHEREAS, the *Muller* Action and *Bente* Action have an Initial Case Management  
 24          Conference set for June 3, 2022, at 2:30PM via Videoconference. The Initial Case Management  
 25          Conference in the *Villanueva* Action is set for June 24, 2022, at 2:30PM via Videoconference;

26          WHEREAS, the parties agree that in coordinating their efforts, the Initial Case  
 27          Management Conference in the *Muller* Action and *Bente* Action should be continued to the date  
 28

set in the *Villanueva* Action, June 24, 2022, at 2:30, and the date to submit a Joint Case Management Statement between all parties shall be June 17, 2022;

WHEREAS, the parties agree nothing in this stipulation, proposed order, or enacted order shall restrict any party's rights under 28 U.S.C. § 636(c) or Northern District of California General Order 44;

WHEREAS, the parties agree nothing in this stipulation, proposed order, or enacted order shall be cited by or used in support of any future briefing on issues relating to class certification in the above-mentioned Related Actions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, among the undersigned parties, and respectfully submitted for the Court's approval, as follows:

1. The above-captioned Related Actions (collectively, "the Consolidated Action") are hereby consolidated for all purposes pursuant to Federal Rule of Civil Procedure 42(a);

2. A Master Docket and Master File are hereby established for the Consolidated Action. The Master File number shall be 3:22-00346-SI. A Master Docket will be maintained for the Actions with all entries to be docketed under the Master File number. If a document pertains to only one of the consolidated cases, it will be docketed on the Master Docket with the notation in the docket text as to the case number(s) to which it pertains;

3. The Action shall be referred to as: *In re UKG Inc Cybersecurity Breach Litigation* and every pleading or other paper filed in the Consolidated Action shall bear the following caption:

IN RE UKG INC CYBERSECURITY LITIGATION
THIS DOCUMENT RELATES TO:

Master Docket No. 3:22-00346-SI

CLASS ACTION

4. All papers previously filed and served to date in the Related Actions are deemed part of the record in *In re UKG Inc Cybersecurity Breach Litigation*.

1           5.       Undersigned counsel for Defendant is authorized to accept, and hereby does  
2 accept, service of the summons and complaints in each of the above-captioned actions on behalf  
3 of Defendant, without prejudice to and waiver of any of Defendant's defenses, objections, or  
4 arguments, except as to sufficiency of service of process;

5           6.       Defendant is not required to answer or otherwise respond to the currently filed  
6 complaints in the above-captioned actions;

7           7.       Within 30 days of the Court's Order on consolidation, Plaintiffs shall file a  
8 Consolidated Amended Class Action Complaint (the "Consolidated Complaint");

9           8.       Defendant shall file an answer or a motion to dismiss within 45 days after the  
10 filing of the Consolidated Complaint; and

11           9.       If Defendant files a motion to dismiss, Plaintiffs shall file an opposition to the  
12 motion to dismiss within 45 days after the motion is filed, and Defendant shall file a reply within  
13 21 days after the opposition is filed.

14           10.      The date of the Initial Case Management Conference in the Consolidated Action  
15 shall be June 24, 2022, at 2:30 via Videoconference and the date to submit a Joint Case  
16 Management Statement shall be June 17, 2022.

17 **IT IS SO STIPULATED.**

18                               Dated: May 19, 2022

19                               **ALEXANDER MORRISON & FEHR LLP**

20                               /s/ Michael S. Morrison  
21                               Michael Scott Morrison  
22                               Erin Lim  
23                               1900 Avenue of the Stars, Suite 900  
24                               Los Angeles, CA 90067  
25                               Tel: (310)-394-0888  
26                               Fax: (310) 394-0811  
27                               mmorrison@amfllp.com  
28                               elim@amfllp.com

**WUCETICH KOROVILAS LLP**

/s/ Jason M. Wucetich  
                                  Jason Matthew Wucetich  
                                  Dimitrios Vasiliou Korovilas  
                                  222 Pacific Coast Highway Suite 2000

1 El Segundo, CA 90245  
2 Tel: (310) 335-2001  
3 Fax: (310) 364-5201  
4 jason@wukolaw.com  
5 dimitri@wukolaw.com

*Counsel for Plaintiffs William Muller and Antonio Knezevich*

6 Dated: May 19, 2022

7 **LAW OFFICE OF RONALD A. MARRON**

8 /s/ Ronald A. Marron  
9 Ronald A. Marron  
10 Alexis M. Wood  
11 Kas L. Gallucci  
12 651 Arroyo Drive  
13 San Diego, CA 92103  
14 Tel: (619) 696-9006  
15 Fax: (619) 564-6665  
16 ron@consumersadvocates.com  
17 alexis@consumersadvocates.com  
18 kas@consumersadvocates.com

*Counsel for Plaintiff Adam Bente*

16 Dated: May 19, 2022

18 **LEBE LAW**

19 /s/ Jonathan M. Lebe  
20 Jonathan Michael Lebe  
21 Zachary Taylor Gershman  
22 Nicolas W. Tomas  
23 777 S. Alameda Street, Second Floor  
24 Los Angeles, CA 90021  
25 Tel: (213)444-1973  
26 Fax: (  
27 jon@lebelaw.com  
28 zacary@lebelaw.com  
nicolas@lebelaw.com

*Counsel for Plaintiff Cindy J. Villanueva*

Dated: May 19, 2022

**SHOOK, HARDY & BACON L.L.P**

/s/ Tammy B. Webb

Tammy B. Webb

555 Misson Street, Suite 2300

San Francisco, California 94105

Tel: (415) 544-1900

Fax: (415) 391-0281

tbwebb@shb.com

Elisabeth Hutchinson *pro hac vice*

1660 17<sup>th</sup> Street, Suite 450

Denver, CO 80202

Tel: (303) 285-5300

Fax: (303) 285-5301

ehutchinson@shb.com

*Counsel for Defendant UKG Inc.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: May 20, 2022, 2022



HON. SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE



**FILER'S ATTESTATION OF CONCURRENCE**

I, Dimitrios V. Korovilas, pursuant to Local Rule 5-1(i), attest that I am counsel for Plaintiffs William Muller and Antonio Knezevich. As the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.

Date: May 19, 2022

**WUCETICH & KOROVILAS LLP**

By: /s/ Dimitrios V. Korovilas  
Dimitrios V. Korovilas